

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

MINING PROJECT WIND DOWN HOLDINGS,  
INC. (f/k/a Compute North Holdings, Inc.),  
et al.,

Debtors.<sup>1</sup>

Chapter 11

Case No. 22-90273 (MI)

**SUSTAINING DOCUMENTS FILING, IN RELATION RESPONSE 1213 AND 1211 AND TO CLAIM  
10029, FILED AS ADDENDUMS / EXHIBITS TO RESPONSE 1213, 1211 TO OBJECTION 1199  
(FILED BY THE PLAN ADMINISTRATOR) TO CLAIM 10029 (FILED BY CLAIMANT NELU MIHAI)**

1. NELU MIHAI, PhD, former funding Chief Technology Officer at Compute North LLC / Debtors, in his capacity as Creditor (“Creditor”) and Claimant of the Claim no. 10029 filed on October 24, 2022, in case 22-90273 (the “Bankruptcy Case”, “Case no. 22-90273”), respectfully ask the Court to take into consideration the following aspects related to the claim 10029, referred in the “Response” (Docket # 1213 and Docket #1211, filed on 08/07/2023) to “Objection” no. 1199 and “Proposed Order” 1199-2 filed by the Plan Administrator on 07/07/2023, and respectfully ask to consider these new aspects and sustaining materials to reject the Objection 1199 and Proposed Order 1199-2 and issue an order for allowance for my claim 10029.

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<sup>1</sup> The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor’s federal tax identification number, include: Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) (4534); Mining Project Wind Down LLC (f/k/a Compute North LLC) (7185); Mining Project Wind Down Corpus Christi LLC (f/k/a CN Corpus Christi LLC) (5551); Mining Project Wind Down Atoka LLC (f/k/a CN Atoka LLC) (4384); Mining Project Wind Down BS LLC (f/k/a CN Big Spring LLC) (4397); Mining Project Wind Down Colorado Bend LLC (f/k/a CN Colorado Bend LLC) (4610); Mining Project Wind Down Developments LLC (f/k/a CN Developments LLC) (2570); Mining Project Wind Down Equipment LLC (f/k/a CN Equipment LLC) (6885); Mining Project Wind Down King Mountain LLC (f/k/a CN King Mountain LLC) (7190); Mining Project Wind Down MDN LLC (f/k/a CN Minden LLC) (3722); Mining Project Wind Down Mining LLC (f/k/a CN Mining LLC) (5223); Mining Project Wind Down Pledgor LLC (f/k/a CN Pledgor LLC) (9871); Mining Project Wind Down Member LLC (f/k/a Compute North Member LLC) (8639); Mining Project Wind Down NC08 LLC (f/k/a Compute North NC08 LLC) (8069); Mining Project Wind Down NY09 LLC (f/k/a Compute North NY09 LLC) (5453); Mining Project Wind Down STHDAK LLC (f/k/a Compute North SD, LLC) (1501); Mining Project Wind Down Texas LLC (f/k/a Compute North Texas LLC) (1883); Mining Project Wind Down TX06 LLC (f/k/a Compute North TX06 LLC) (5921); and Mining Project Wind Down TX10 LLC (f/k/a Compute North TX10 LLC) (4238). The Reorganized Debtors’ service address for the purposes of these chapter 11 cases is 2305A Elmen Street, Houston, TX 77019.

2. I respectfully seek / kindly request to take into consideration the following aspects:
3. The Objection 1199 opened the Pandora's box. Being forced by this situation, I have to read all the financial Disclosure Statements, not available to me until now. This investigation made me discover not just a discriminated manner in which Compute North LLC / Debtors treated me, but also other false financial statements made by Debtors, concerning me.
4. As a follow up of this situation, now I have the opportunity to provide to the Court the specifics / exact situation of my Claim 10029.
5. I submit Addendum no.3 proving that, from legal point of view, based on the terms of the Separation Agreement, the correct amount that Compute North LLC / Debtors owes me as unpaid accrued obligations under Section 9.a of the Separation Agreement signed on March 28, 2022 are as following:
6. Total obligations for late payments (according to Section 9.a. of the Separation Agreement) before September 16, 2022 is \$44,998.80.
7. Obligations accrued and calculated to \$150,004 unpaid debt, between September 16, 2022 and September 22, 2022 (The Bankruptcy Petition date) is \$18,000.48
8. Total obligations for late payments accrued between 04/15/2022 and 09/22/2022 (the Bankruptcy Petition date) is \$62,999.28.
9. Obligations for late payments, calculated for the period 04/15/2022 and February 1<sup>st</sup>, 2023 are in the amount of \$456,009.76
10. The addendum also contains the calculus of obligations from 04/15/2022 and the Hearing date of 08/14/2023.
11. In any business, executives bear the responsibility for the company they manage, including taking it into bankruptcy. By studying the Disclosure Financial Statements of the Debtors, and learning about the very high bonuses, salary increases, perks etc. after the funding round (the funding was provided by investors and venture-capitalists), having in mind that, even since December 2021, the business conditions increased the probability for a future bankruptcy, I am asking what is the Plan Administrator's opinion about these spendings. Were these spendings fair for investors and creditors? I am one of the creditors, who had the decisive contribution for funding with +\$300M, and respectfully ask the Plan Administrator to be fair with me, as well.

**12.** I submit Addendum no. 3 with calculus of obligations related to Claim 10029.

**CONCLUSION**

13. These new supporting materials contradicts the opinions stated by the Plan Administrator stated in “Objection” 1199 to my Claim 10029.
14. We kindly request that the Claim 10029 be allowed in its entirety, and that the Court grant such order of allowance.

Respectfully,



Nelu Mihai

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